IN THE UNITED DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Joaquin Nevarez,)
1) CASE NO 23 CV 5248
) Honorable Jeremy C. Daniel)Magistrate Judge Heather K. McShain
Plaintiff,)
)
VS.)
DynaCom Management, LLC.,)
Ali Setork and Mina Setork)
Individually)
Under FLSA and IWPCA)
As Employers)
And the Employee)
Classification Act)
Pursuant to 820 ILCS 185/63)
) JURY TRIAL DEMANDED ON ALL COUNTS
Defendants.) ON ALL COUNTS

PLAINTIFFS' UNOPPOSED MOTION FOR ENTRY OF JUDGMENT

NOW COMES the Plaintiff, Joaquin Nevarez, individually, by and through his undersigned counsel of record, and Motions this Court for Entry of a Judgment and in so doing states the following:

- 1. On December 17, 2024 Defendants in this matter made Offers of Judgment in the amount of \$275,000.00 to the named Plaintiff Joaquin Nevarez and to Opt-In Plaintiff David Sanchez. (See Dkt. #62-1).
- On December 28, 2024 the Plaintiffs in this litigation accepted Defendants Offers of Judgement.
- 3. On December 28 2024 Plaintiffs filed on the Docket in this case the acceptance of the Offers of Judgment. (See Dkt. 62).

- 4. The parties now are seeking to resolve the case, but the Defendants insist on entry of Judgement, before paying the funds to resolve the case.
- 5. Therefore Plaintiffs ask the court to Enter Judgment in the amount of \$275,000 for the Plaintiffs in this matter.
- 6. Defendants do not oppose this Motion, and insist on entry of Judgement prior to payment.

WHEREFORE, Plaintiffs' ask this court to Enter Judgment for Plaintiffs in the Amount of \$275,000.00 and for other relief that is just and right.

Respectfully Submitted by __/S/John C. Ireland

The Law Office of John C. Ireland 636 Spruce Street South Elgin ILL 60177 630-464-9675
Fax 630-206-0889
Attorneyireland@gmail.com

Dated: January 24, 2025

WHEREFORE, Plaintiffs' ask this court to Enter Judgment for Plaintiffs in the Amount of \$275,000.00 and for other relief that is just and right.

Respectfully Submitted by __/S/John C. Ireland The Law Office of John C. Ireland 636 Spruce Street South Elgin ILL 60177 630-464-9675 Fax 630-206-0889 Attorneyireland@gmail.com

Dated: January 24, 2025